

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA)	CASE NO. 19 CR 28
)	
Plaintiff,)	JUDGE GWIN
)	
MATTHEW MULFORD)	MOTION TO CONTINUE
)	PRE-TRIAL AND TRIAL
)	DATE
Defendant)	

Now comes the defendant, MATTHEW MULFORD, by and through his attorney, James McDonnell, and requests that the pre-trial set for March 11, 2019 and the trial set for March 18, 2019 be continued.

The reason for the pre-trial continuance is that defense counsel's wife is scheduled for carotid artery surgery on March 11, 2019. The reason for the trial date continuance is that further discovery is required.

Defendant intends to enter into a guilty plea, however the negotiations between the parties are ongoing. Specifically, determining the appropriate drug quantities involves the interpretation of data collected from dark net marketplaces.

Further, the government alleges that money laundering took place via cryptocurrencies including bitcoin. Accounting for these transfers requires an analysis of the Bitcoin blockchain and the conversion of cryptocurrency into fiat currency before Mr. Mulford's guidelines can be calculated. Mr. Mulford respectfully requests that this matter be set for a change of plea hearing in thirty days. This

will give the parties sufficient time to negotiate an agreeable resolution. If the parties are unable to reach an agreement within this time, they will contact the Court and request a trial date. The government has no objection to this motion.

Respectfully Submitted,

s/ James J. McDonnell
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Continuance will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ James J. McDonnell
JAMES J. MCDONNELL (0005802)
Attorney for Defendant